

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare:

1. I am making this statement because the facts herein are relevant in the trial of Religious Technology, et al. v. Joseph Yanney, et al., Los Angeles Superior Court Case No. C690211, now proceeding before Judge Raymond Cardenas.

2. On November 30, 1989 I attended a hearing before Judge Norman Epstein in the Los Angeles Superior Court of the Scientology organization's motion to prevent my deposition from going forward in the case of Bent Corydon v. Church of Scientology International, et al., No. C694401. Before the hearing, while waiting in the hall outside the courtroom I was served with a subpoena duces tecum ordering me to appear as a witness in the Yanney trial.

3. On February 15, 1990 I received a telephone call from attorney Michael Tabb, a partner in the Boston, Massachusetts law firm of Flynn, Sheridan & Tabb which had represented me in the case of Church of Scientology of California and Mary Sue Hubbard v. Gerald Armstrong, Los Angeles Superior Court No. C420153. Mr. Tabb said that he had been called by Larry Heller, a supervising attorney for the Scientology organizations, hereinafter referred to as the organization, who told him that the organization considered I had violated my settlement agreement by being in the courthouse to be served in Yanney, that they intended to prove it and that I would be sued.

4. On March 21 I spoke by telephone with attorney Michael Flynn, counsel of record in Armstrong, who said that he had been called by Mr. Heller two or three weeks before. Mr. Heller told Mr. Flynn that I was sitting

in the courtroom in the Yanney trial and that if I testified in Yanney I would be in violation of the settlement agreement and I would be sued. Mr. Heller asked Mr. Flynn to call me and tell me not to testify. Mr. Flynn said no. The day I had been present at the Yanney trial was March 5, 1990.

5. Attached hereto is a copy of my declaration of March 15, 1990 and the exhibits thereto. I am providing this documentation because it concerns the settlement agreement I entered into with the organization and makes this declaration and my position understandable.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this twenty-sixth day of March, 1990 at Oakland California.

A handwritten signature in black ink, appearing to read 'Gerald Armstrong', is written over a horizontal line. The signature is stylized with a large, looped 'G' and a red highlight under the 'A'.

Gerald Armstrong